

**From:** [noreply@ago.mo.gov](mailto:noreply@ago.mo.gov)  
**To:** [Oliver, Lauren](#)  
**Subject:** New form entry is submitted  
**Date:** Tuesday, February 19, 2019 5:36:41 PM

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<https://ago.mo.gov/Sitefinity>

## New form submission

### [Public Corruption Complaints](#)

Submitted on 19 February 2019, via IP 97.122.165.159

#### YOUR CONTACT INFORMATION

First Name (required)	Jason
Last Name (required)	Gavan
Address (required)	5314 Highlands Parkway
City (required)	Columbia
State (required)	MO
ZIP Code (required)	65203
Phone (required)	573 889 9888
Email	jgavan2@gmail.com

#### COMPLAINT DETAILS

Public Official Name (required)	Ian Thomas
Public Official Title (required)	Columbia City Council Member
	It appears that Mr. Thomas violated the law by agreeing to approve a property owner's request in exchange for compensation to the City of Columbia. Unfortunately this has been the norm within Columbia for decades. City Council engages in "pay to play" if you desire to utilize commercial real estate. Those who refuse to engage in this corruption or speak up against it will find their project rejected and receive notices of "infractions" and "violations" if they own properties within Council's

Briefly Describe Your Complaint: (required)	control. This abuse is typically carried out through off the record communications but has become so common that Mr. Thomas seems to not even be aware that is is considered corruption. A brief article by the Columbia Daily Tribune summarizes the issue. <a href="https://www.columbiatribune.com/news/20190218/thomas-issues-apology-for-development-deal">https://www.columbiatribune.com/news/20190218/thomas-issues-apology-for-development-deal</a> I sent an official complaint to the City of Columbia prosecutor's office but past complaints were ignored. I believe the City prosecutor is unwilling or unable to pursue this political corruption.
If you have any materials or documents relating to your allegation(s), please attach to this complaint.	
If you do not have any material(s) relating to your allegation(s), but know that such material(s) exist(s), describe it and where it may be found, including who may have possession or control over it and how that person or entity may be reached.	Unfortunately I do not have additional documentation to bolster the information within the Tribune article. As a former commercial real estate practitioner I heard numerous verbal complaints from property owners and observed in several years of Council meetings how this system worked but was unable to obtain documentation proving it.
What other action have you taken with regards to this complaint?	Filed a complaint with another agency
<p><b>BY FILING THIS COMPLAINT, I UNDERSTAND THAT:</b></p> <p><i>The Attorney General is not my private attorney, but enforces Missouri laws. I would be willing to testify in court to the facts stated in this complaint. A copy of this complaint may be provided to the public official against whom I am filing this complaint, and in accordance with Missouri law, complaints may under certain circumstances be subject to public disclosure. My complaint, including my name, address, and related documents, may be provided pursuant to a Sunshine Law request.</i></p> <p><b>I ATTEST TO THE ACCURACY OF THE STATEMENTS MADE IN THIS COMPLAINT.</b></p>	



MISSOURI ATTORNEY GENERAL

ERIC SCHMITT

March 07, 2019

Mr. Jason Gavan  
5314 Highlands Parkway  
Columbia, MO 65203

*Re: Your February 19<sup>th</sup> Public Corruption Complaint Submission*

Dear Mr. Gavan:

Thank you for bringing your concerns regarding Columbia City Councilman Ian Thomas the attention of the Missouri Attorney General's Office.

To the extent you believe the subject of your complaint may have committed a criminal offense, know that in order to proceed on a complaint, clear and credible evidence of criminal wrongdoing is required. Upon such a showing, our office will forward the complaint to law enforcement for further investigation. Criminal prosecutions most commonly result from a public official's improper exercise of their duties and responsibilities, for instance, bribery, self-enrichment, stealing, etc. In the event charges are filed, our office stands ready to assist the prosecution in holding the public official accountable.

Under Missouri law, local agencies have authority when investigating and prosecuting criminal cases unless a conflict exists or they request our assistance. Our office will be forwarding your complaint to the Boone County Sheriff's Department for further inquiry. Should that inquiry provide sufficient evidence to support criminal charges, our office will coordinate with the local county prosecuting attorney to determine whether charges are filed and, if so, whether the local prosecutor or the Missouri Attorney General's Office will proceed. It is possible that you may be called upon to assist by any one of these entities. Please be sure to keep us apprised of any address or contact information changes.

Your complaint has been screened by Lauren Oliver, our Director of Constituent Services, and myself. Should additional documentation or information be required from you in the future, our office will reach out to you directly.

Again, thank you for bringing this matter to our attention.

Sincerely,

Steven M. Kretzer  
Assistant Attorney General

Supreme Court Building  
207 W. High Street  
P.O. Box 899  
Jefferson City, MO 65102  
Phone: (573) 751-3321  
Fax: (573) 751-0774  
[www.ssg.mo.gov](http://www.ssg.mo.gov)

**From:** [noreply@ago.mo.gov](mailto:noreply@ago.mo.gov)  
**To:** [Oliver, Lauren](#)  
**Subject:** New form entry is submitted  
**Date:** Wednesday, February 27, 2019 7:26:54 PM

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## New form submission

### [Public Corruption Complaints](#)

Submitted on 27 February 2019, via IP 50.82.142.245

#### YOUR CONTACT INFORMATION

First Name (required)	James
Last Name (required)	Meyer
Address (required)	104 Sea Eagle Dr
City (required)	Columbia
State (required)	MO
ZIP Code (required)	65202
Phone (required)	(573) 489-6150
Email	<a href="mailto:jmeyer@meyerworks.com">jmeyer@meyerworks.com</a>

#### COMPLAINT DETAILS

Public Official Name (required)	Ian Michael Thomas
Public Official Title (required)	Councilman, 4th Ward of Columbia, MO
Briefly Describe Your Complaint: (required)	I attempted to file this complaint with the Missouri Ethics Commission. They refused to accept it as I submitted it within 60 days of the April 2nd election. I believe that Mr. Thomas violated state statue so I am filing this complaint with your office. Please see the attached document.
If you have any materials or	

documents relating to your allegation(s), please attach to this complaint.	<a href="#">Ethics Complaint.pdf</a>
If you do not have any material(s) relating to your allegation(s), but know that such material(s) exist(s), describe it and where it may be found, including who may have possession or control over it and how that person or entity may be reached.	I have copies of two news articles and a constituent newsletter published by Mr. Thomas that I believe support my allegation. It seems like this form will only allow me to submit one document, so I would be happy to send you the other documents by separate email if you will contact me.
What other action have you taken with regards to this complaint?	Filed a complaint with another agency
<p><b>BY FILING THIS COMPLAINT, I UNDERSTAND THAT:</b></p> <p><i>The Attorney General is not my private attorney, but enforces Missouri laws. I would be willing to testify in court to the facts stated in this complaint. A copy of this complaint may be provided to the public official against whom I am filing this complaint, and in accordance with Missouri law, complaints may under certain circumstances be subject to public disclosure. My complaint, including my name, address, and related documents, may be provided pursuant to a Sunshine Law request.</i></p> <p><b>I ATTEST TO THE ACCURACY OF THE STATEMENTS MADE IN THIS COMPLAINT.</b></p>	



# OFFICIAL COMPLAINT FORM

Missouri Ethics Commission  
PO Box 1370  
Jefferson City, MO 65102-1370

Section 105.957, RSMo states that the Commission shall receive any complaints alleging violations of the provisions of:

- 1) The requirements imposed on lobbyists by section 105.470 to 105.478;
- 2) The financial interest disclosure requirements contained in sections 105.483 to 105.492;
- 3) The campaign finance disclosure requirements contained in chapter 130, RSMo;
- 4) Any code of conduct promulgated by any department, division or agency of state government, or by state institutions of higher education, or by executive order;
- 5) The conflict of interest laws contained in sections 105.450 to 105.467 and section 171.181, RSMo; and
- 6) The provisions of the constitution or state statute or order, ordinance or resolution of any political subdivision relating to the official conduct of officials or employees of the state and political subdivisions.

This complaint shall contain all the facts known to the person bringing the complaint that give rise to the complaint.

This complaint shall be sworn to under penalty of the crime of perjury.

Within 5 days of receipt of this complaint, the Commission will send a copy of this complaint, including the name of the person bringing this complaint, to the person, organization or campaign committee against whom the complaint is brought.

**Note:** According to Missouri State Law, the Commission shall dismiss any complaint which is frivolous in nature, as lacking any basis in fact or law. Any person who submits a frivolous complaint shall be liable for actual and compensatory damages to the alleged violator for holding the alleged violator before the public in a false light. A finding by the Commission that a complaint is frivolous or without probable cause shall be a public record.

**THIS FORM MUST BE RETURNED BY MAIL OR HAND-DELIVERED. FAXED COPIES OR EMAILS WILL NOT BE ACCEPTED.**

## PART 1 - PERSON BRINGING COMPLAINT:

NAME: <b>James Charles Meyer</b>		DATE OF COMPLAINT: <b>2/22/2019</b>	
ADDRESS: <b>104 Sea Eagle Dr</b>			
CITY: <b>Columbia</b>	STATE: <b>MO</b>	COUNTY: <b>Boone</b>	ZIP: <b>65202</b>
CONTACT PHONE NUMBER/S: (HOME)	(WORK)	(CELL) <b>(573) 489-6150</b>	
TITLE OF OFFICE HELD OR SOUGHT (IF APPLICABLE): <b>n/a</b>			

## PART 2 - ORGANIZATION OR CAMPAIGN COMMITTEE AND INDIVIDUAL(S) OR POSITION(S) AGAINST WHOM

### THIS COMPLAINT IS BEING BROUGHT AGAINST:

NAME: <b>Ian Michael Thomas</b>			
ADDRESS: <b>2616 Hillshire Dr</b>			
CITY: <b>Columbia</b>	STATE: <b>MO</b>	COUNTY: <b>Boone</b>	ZIP: <b>65203</b>
CONTACT PHONE NUMBER/S: (HOME) <b>(573) 239-7916</b>	(WORK) <b>(573) 239-7916</b>		
TITLE OF OFFICE HELD OR SOUGHT (IF APPLICABLE): <b>4th Ward City Councilman, Columbia, MO</b>			
DATE OF ELECTION (IF APPLICABLE):		CHECK ELECTION TYPE (IF APPLICABLE): <input type="checkbox"/> Primary <input type="checkbox"/> General	

### VERIFICATION BY OATH OR AFFIRMATION

STATE OF MISSOURI  
COUNTY OF Boone

I, **James Charles Meyer**, being duly sworn upon oath and affirmation legally administered, certify under penalty of perjury that the foregoing information in this complaint is complete, true, and correct, to the best of my knowledge and belief.

*James Charles Meyer*  
Signature of Complainant

Subscribed and sworn to before me this 22nd day of February, 2019.

My Commission Expires:



**MALINDA J. DUFFIN**  
My Commission Expires  
June 11, 2020

Commission #12388523

*Malinda J. Duffin*  
Notary Public

### PART 3 - STATEMENT OF FACTS:

State in your own words the detailed facts and the actions of the candidate or organization named in part two which prompted you to make this complaint. The space provided below is not intended to limit your statement of facts. Please use additional sheets if necessary. Include relevant dates and times, and the names and addresses of other persons whom you believe have knowledge of the facts and attach hereto copies of any documentary evidence that supports the facts alleged in the complaint.

Please check the box next to the area that the complaint concerns.

- ☐ 1. The requirements imposed on lobbyists by sections 105.470 to 105.478.
- ☐ 2. The financial interest disclosure requirements contained in sections 105.483 to 105.492.
- ☐ 3. The campaign finance disclosure requirements contained in chapter 130, RSMo.
- ☐ 4. Any code of conduct promulgated by any department, division or agency of state government, or by state institution of higher education, or by executive order.
- ☒ 5. The conflict of interest laws contained in sections 105.450 to 105.467 and section 171.181, RSMo.
- ☒ 6. The provisions of the constitution or state statute or order, ordinance or resolution of any political subdivision relating to the official conduct of officials or employees of the state and political subdivisions.

#### PLEASE STATE THE FACTS BELOW:

Based on media reports in the The Columbia Missourian on February 9, 2019, comments made in his newsletter to constituents on February 17, 2019, reports in the Columbia Daily Tribune on February 18, 2019, and his remarks on the record in a public meeting of the Columbia City Council on February 18, 2019, it appears that Councilman Thomas violated section 105.452 (1) of RSMo. The statute reads in relevant part "105.452. Prohibited acts by elected and appointed public officials and employees. — 1. No elected or appointed official or employee of the state or any political subdivision thereof shall: (1) Act or refrain from acting in any capacity in which he is lawfully empowered to act as such an official or employee by reason of any payment, offer to pay, promise to pay, or receipt of anything of actual pecuniary value paid or payable, or received or receivable, to himself OR ANY THIRD PERSON (emphasis added), including any gift or campaign contribution, made or received in relationship to or as a condition of the performance of an official act, other than compensation to be paid by the state or political subdivision;..."

It seems clear that Councilman Thomas solicited a cash payment from a developer to be paid to a third party e.g. the Community Land Trust in return for his favorable treatment of the developer's annexation and rezoning request. Although Thomas would not have personally benefited financially from this scheme, it appears to be a corrupt quid pro quo to further his ideological agenda at the expense of the property rights and due process rights of the developer and the landowner. It also tends to reduce the trust of the public in the openness and fairness of the process used to promulgate ordinances in the City of Columbia.

The Charter of the City of Columbia in Article II, Section 12 states that "neither the council nor any member thereof shall give orders to the subordinates of the city manager, either publicly or privately." It seems likely that Councilman Thomas attempted to influence staff into accepting his proposed quid pro quo. The Charter further provides that "The office of any council member violating the provisions of this section shall be forfeited."

- ☐ YES    Are any of the matters alleged by you the subject of civil or criminal litigation? If yes, please provide  
☒ NO    the county and case number if known by you.



MISSOURI ATTORNEY GENERAL

ERIC SCHMITT

March 07, 2019

Sheriff Dwayne Carey  
Boone County Sheriff's Department  
2121 County Drive  
Columbia, MO 65202

*Re: Investigation of Columbia City Councilman*

Dear Sheriff Carey:

The Missouri Attorney General's Office is requesting investigative assistance involving a constituent complaint against Columbia City Councilman, Ian Thomas. My office received the complaint through our online Public Corruption submission form. That complaint is enclosed with this letter.

It is my hope that your office will be able to review the complaint, determine if further inquiry is warranted and, if so, conduct an investigation. As you are aware, any decision on the filing of criminal charges vests with Boone County Prosecuting Attorney, Dan Knight. As such, I encourage you to refer any potential criminal charges to his attention.

If there is anything I can do to assist in the investigation, I will make myself available. All of the information we have is included with this request. Upon completion of your inquiry, this office will be happy to review your findings and coordinate with Mr. Knight to determine if criminal charges are warranted.

Thank you for your assistance in this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "S.M. Kretzer".

Steven M. Kretzer  
Assistant Attorney General

Enclosure



## Kretzer, Steven

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**From:** noreply@ago.mo.gov  
**Sent:** Tuesday, February 19, 2019 5:37 PM  
**To:** Kretzer, Steven  
**Subject:** New form entry is submitted

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

**Sitefinity**  
<https://ago.mo.gov/Sitefinity>

## New form submission

### Public Corruption Complaints

Submitted on 19 February 2019, via IP 97.122.165.159

YOUR CONTACT INFORMATION	
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Last Name (required)	Gavan
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City (required)	Columbia
State (required)	MO
ZIP Code (required)	65203
Phone (required)	573 889 9888
Email	jgavan2@gmail.com
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Public Official Title (required)	Columbia City Council Member
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